

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: EDISON LAO TING

Serial No.: 10/604,450

Group Art Unit: 2166

Filed: 7/22/2003

Examiner: Navneet Ahluwalia

Title: *Isolated Ordered Regions (IOR) Node Order*

**REPLY BRIEF**

Attn: Board of Patent Appeals and Interferences  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

In response to the Appeal Brief filed 5/01/2008, and the Examiner's Answer dated 7/21/2008, Applicants submit the following reply.

### **REMARKS**

This Reply Brief is in response to the Examiner's Answer dated 7/21/2008. Reconsideration of this application is respectfully requested in view of the foregoing remarks. In addition, all of the arguments in the appeal brief of 5/01/2008, and prior responses should also be considered in support of the claimed elements provided in the present invention.

### **STATUS OF CLAIMS**

Claims 1-20 are pending.

Claims 1-20 stand rejected under 35 USC 103(a) as being unpatentable over Lin et al. (U. S. Patent 6,491,521 B2) further in view of Liu et al. (U.S. Publ. Appln. 2004/0168119A1).

**Claims 1-20 are hereby appealed.**

### **RESPONSE TO EXAMINER'S ANSWER**

Applicants wish to note that the following rejections have been withdrawn by the Examiner in the response of 07/21/2008:

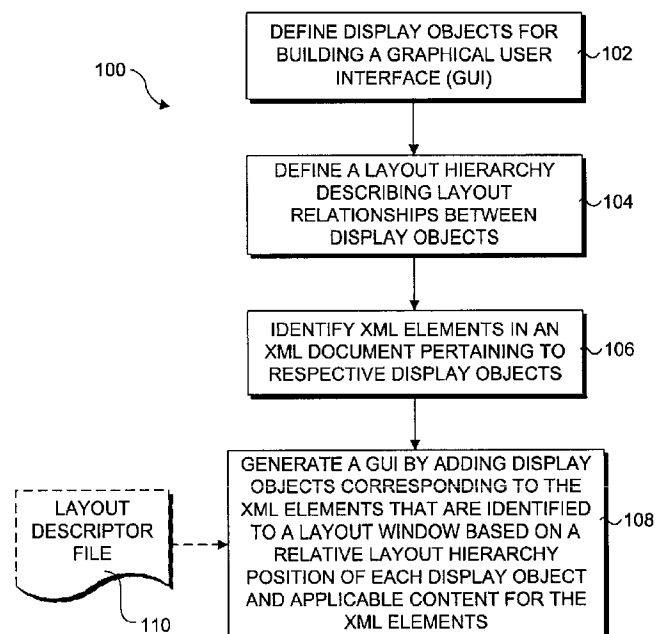
- Claims 1-7, 9-17 and 19-20 stand rejected under 35 USC 102(e) as being anticipated by Ferrari et al. (U.S. Publ. Appln. 2003/0097357A1).
- Claims 8 and 18 stand rejected under 35 USC 103(a) as being unpatentable over Ferrari et al., as applied to claims 1-7, 9-17 and 19-20 above, and further in view of Tip et al. (U.S. Publ. Appln. 2003/0018603A1).

Claims 1-20 stand rejected under 35 USC 103(a) as being unpatentable over Lin et al. (U. S. Patent 6,491,521 B2) further in view of Liu et al. (U.S. Publ. Appln. 2004/0168119A1). Lin teaches a method for dynamically generating a graphical user interface (GUI) from XML-

based documents, wherein the GUI is generated by rendering identified display objects on the layout window, wherein the size and the position of each display object is based on layout rules defined by the layout hierarchy and a hierarchical position of the XML element pertaining to the display object within a hierarchy of XML elements of the XML document.

Liu teaches the generation of a report based on a selection of displayed nodes by the user. Liu's invention has the utility of "dynamically creating a structured report that can be accessed instantaneously".

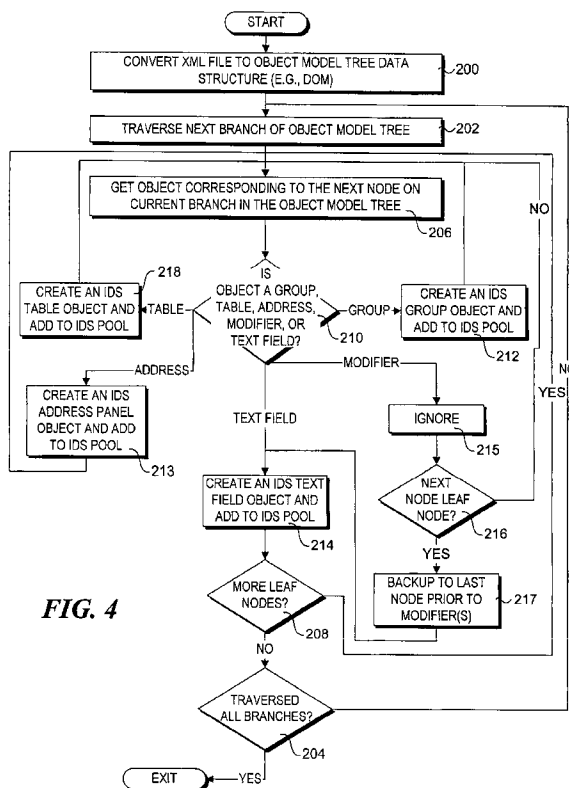
In the 'Response to Arguments' section of response of 07/21/2008, the Examiner once again asserts that FIG. 1 and column 3, lines 63-67 and column 4, lines 1-4 and 20-42 of Lin teach Applicants' claim 1's feature of a node generator parsing entities in a document and creating a plurality of nodes that represent said entities and relationships that exists among said entities. FIG. 1 of Lin is provided below:



As mentioned in Applicants' previous response, FIG. 1 of Lin illustrates "a high-level flowchart illustrating a process for generating a graphical user interface (GUI)". FIG. 1 and the Examiner's citations merely teach a method for the conversion of an XML file to a DOM tree.

The Examiner has yet again failed to explain how such a feature of GUI generation can be equated to Applicants' feature of a node generator that parses entities in a document to create nodes that represent entities and relationships that exists among the entities.

In the 'Response to Arguments' section of response of 07/21/2008, the Examiner once again asserts that FIG. 4 and column 5, lines 19-40 teach the feature of a node grouper grouping the created plurality of nodes into a plurality of regions, wherein each of the regions define an area within an n-dimensional space, wherein  $n$  is greater than one. . FIG. 4 of Lin is provided below:



Lin's FIG. 4 merely illustrates a flow chart for creating an "intermediate data structure". Further, the Examiner's citation in column 5 of Lin's merely mentions that "Under DOM, group objects correspond to parent nodes having one or more child nodes, each of which are connected to the parent object's branch with a respective branch." For example, in Lin's Fig. 2B, the group object called "PurchaseOrder" is connected to the PhysicalAddress node **130o** via branch **141**, the comment node **146o** via branch **142**, the ProductLineItem node **131o** via **143**, the Product Line Item node **132o** via branch **144**, and the Product Line Item node **133o** via branch **145**. DOM's group objects, therefore, merely refer to a parent node with any children. The present invention's claim 1 explicitly recites the grouping of a plurality of nodes into a plurality of regions, wherein each of the regions define an area within an n-dimensional space, wherein  $n > 1$  (e.g., nodes are grouped into a plurality of regions with each region defining a 2-dimensional space).

The Examiner has yet again failed to explain why such a group object anticipates or renders obvious the feature of a node grouper grouping nodes into two or more regions, with each region defining at least a 2-dimensional space.

In the 'Response to Arguments' section of response of 07/21/2008, the Examiner once again asserts that claim 1's feature of a "formatter" is taught by Liu's paragraphs 52-53 and 57. Applicants' formatter formats the plurality of regions for storage, wherein the regions formatted for storage in Applicants claims and disclosure refer to the regions containing the grouping of nodes and regions defining an area in an n-dimensional space. Applicants respectfully assert that Liu's formatter **218** of Liu is merely a report formatter for the creation of an expanded report and

provides no teaching or suggestion for forming regions containing grouping of nodes within an n-dimensional space, whereby the regions are formatted for storage.

The Examiner has yet again failed to show how such a report formatter can anticipate or render obvious Applicants' feature of a formatter that formats regions for storage, wherein each region defines at least a two-dimensional space enclosing a grouping of nodes representing entities and relationships among entities of a document.

As mentioned in Applicants' previous response, Applicants assert that even if the teachings of Lin were to be combined with the teachings of Liu, one of ordinary skill in the art would merely develop an implementation that would dynamically generate a graphical user interface from XML documents wherein the implementation would additionally have the feature of automatically creating and formatting a report. Applicants maintain that such a teaching cannot teach or suggest the above-described features of Applicants' claim 1.

Absent such features, Applicants maintain that the combination of Lin and Liu CANNOT teach or suggest the features of Applicants' claim 1. Hence, Applicants respectfully assert that the Examiner improperly issued a 35 U.S.C. §103(a) rejection with respect to independent claim 1. With respect to the rejection of independent claim 11, the Examiner uses the same citations as used in claim 1. Hence, the above-mentioned arguments substantially apply to independent claim 11. Hence, Applicants respectfully assert that the combination of Lin and Liu CANNOT teach or suggest many of the features of independent claim 11. Therefore, Applicants respectfully assert that the Examiner improperly issued a 35 U.S.C. §103(a) rejection with respect to independent claim 11.

Hence, at least for the arguments presented above, and further in view of the arguments presented in the Appeal Brief, Applicants respectfully assert that the combination of Lin and Liu fail to teach many of the features of the Applicants' pending claims. Therefore, Applicants respectfully maintain that an improper rejection was issued with regards to pending claims 1-20.

### **SUMMARY**

None of the references, cited or applied, provide for the specific claimed details of applicants' presently claimed invention, nor renders them obvious. It is believed that this case is in condition for allowance and reconsideration thereof and early issuance is respectfully requested.

As this Reply Brief has been timely filed within the set period of response, no petition for extension of time or associated fee is required. However, the Commissioner is hereby authorized to charge any deficiencies in the fees provided to Deposit Account No. 09-0460.

Respectfully submitted,

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